

NJID 793711

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Attorneys for PHH MORTGAGE CORPORATION AS SERVICER FOR U.S. BANK
NATIONAL ASSOCIATION, AS TRUSTEE FOR BANC OF AMERICA FUNDING
CORPORATION MORTGAGE PASS-THROUGH CERTIFICATES, SERIES 2006-8T2

UNITED STATES BANKRUPTCY COURT
FOR THE DISTRICT OF NEW JERSEY

IN RE: : CHAPTER 13
THOMAS M SABO
JOANN D SABO A/K/A JOANN : CASE NO. 17-19534-MBK
GEADA
Debtors : **NOTICE OF MOTION FOR
RELIEF FROM AUTOMATIC
STAY**

JOANN D SABO A/K/A JOANN GEADA YAKOV RUDIKH, Esquire
1 GARRETSON DRIVE 223 Rt. 18 South, SUITE 108
FRANKLIN PARK, NEW JERSEY 08823 E. BRUNSWICK, NJ 08816

THOMAS M SABO ALBERT RUSSO
1 GARRETSON DRIVE CN 4853
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U.S. TRUSTEE.
ONE NEWARK CENTER STE 2100
NEWARK, NJ 07102

PLEASE TAKE NOTICE that on 08/15/2017, at 9:30 AM or as soon as counsel may be heard, the undersigned attorney for the secured creditor will move before the United States Bankruptcy Court, TRENTON, NJ 08608, for an Order Vacating the Automatic Stay with respect to property located at 1 GARRETSON DRIVE, FRANKLIN PARK, NEW JERSEY 08823 and allowing PHH MORTGAGE CORPORATION AS SERVICER FOR U.S. BANK NATIONAL ASSOCIATION, AS TRUSTEE FOR BANC OF AMERICA FUNDING CORPORATION MORTGAGE PASS-THROUGH CERTIFICATES, SERIES 2006-8T2 to continue its contractual remedies or other remedies that may be available under state law, by reason of failure of the debtor to make regular monthly mortgage payments outside the Chapter 13 Plan.

PLEASE TAKE FURTHER NOTICE, that in support of the within Motion, the Movant will rely upon the Certification in Support and the proposed Order submitted herewith, as well as, oral arguments, if necessary. Pursuant to D.N.J. LBR 9013-2, Movant states that no brief or memorandum of law is necessary because of the absence of novel or complex questions of law. However, if responsive papers are filed in opposition to the Motion, the Movant reserves the right to respond to any issues of law raised therein in the form of a brief or a memorandum of law.

Dated: July 18, 2017

/s/ Nicholas V. Rogers
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